



NEVADA COUNTY SANITATION DISTRICT NO. 1
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Steven L. DeCamp
Deputy District Administrator

Mark Miller
Director of Sanitation

March 31, 2009

File: 300.1742 003
"CERTIFIED MAIL"

Jim Pedri, Assistant Executive Officer
California Regional Water Quality Control Board - Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002

SUBJECT: Nevada County Sanitation District No. 1 (Discharger) Comments on Tentative Waste Discharge Requirements Renewal for National Pollutant Discharge Elimination System (NPDES) Permit (NPDES No. CA 0081612) for the Lake of the Pines Wastewater Treatment Plant

Dear Mr. Pedri:

Nevada County Sanitation District No. 1, Lake of the Pines, Zone 2, (NCSDD1LOP) is providing this letter and enclosure (Attachment "A") as its comments on the Tentative Waste Discharge Requirements (WDRs) Renewal for National Pollutant Discharge Elimination System (NPDES) Permit (NPDES No. CA 0081612) for Lake of the Pines Wastewater Treatment Plant.

If you have any questions, please feel free to contact me at (530) 265-7103.

Sincerely,

MARK MILLER
Nevada County Sanitation District No. 1

A handwritten signature in cursive script that reads "Gordon Plantenga".

Gordon Plantenga
Wastewater Operations Manager

GP:ms

Enclosures - Attachment A - District Comments on Tentative Permit

cc: Nevada County Sanitation District No. 1 Board of Directors
Sanitation District Advisory Committee
County Counsel, Attention: Rob Shulman
RWQCB, Sacramento, Attention: Diana Messina
Kennedy/Jenks, Attention: Ken Shuey
Robertson-Bryan, Inc., Attention: Michael Bryan

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Attachment A

COMMENTS
ON
TENTATIVE
WASTE DISCHARGE REQUIREMENTS
FOR
NEVADA COUNTY SANITATION DISTRICT NO. 1
LAKE OF THE PINES WASTEWATER TREATMENT PLANT
NEVADA COUNTY

March 30, 2009

I. LIMITATIONS AND DISCHARGE REQUIREMENTS

p. 1, Facility Contact, Table 4. The phone number for Wayne Robison is (530) 268-1312. This is shown correctly on p. F-3 of the permit.

p. 22, C.3.a Salinity Evaluation and Minimization Plan. Both the average effluent EC (391 umhos/cm) and receiving water EC levels (average of 419 umhos/cm) are substantially lower than the lowest numeric criterion that might be used to interpret the narrative objective (i.e., the United Nations agricultural goal of 700 umhos/cm). In fact, the effluent EC averages approximately 309 umhos/cm lower than the State's lowest goal level for POTWs. Clearly there is no water quality problem from the effluent contribution to the receiving water or the receiving water contributing its flow to Magnolia Creek, Bear River, or the Sacramento-San Joaquin Delta. As such, a salinity evaluation and minimization plan cannot be justified and is, therefore, not needed for this facility. The District requests that the requirement for this plan be removed from the Order.

II. MONITORING AND REPORTING PROGRAM (MRP)

p. E-4 to E-5, Table E-3, Effluent Monitoring. Footnotes 10 and 11 in the "Other Pollutants" row should be renumbered to footnotes 9 and 10, respectively.

Furthermore, Table E-3 specifies annual monitoring for alpha-BHC, aldrin, and dieldrin. Because post-plant-upgrade monitoring shows that these compounds are typically not present in the effluent, because they have been banned for many years and are not expected to be used and thus are not controllable within the service area, and because their rare detection is likely the result of legacy levels in the environment that enter the treatment plant through I&I or other means, the monitoring proposed here is for similar reasons as that proposed for copper, cyanide, iron, and manganese, which is to further demonstrate that, with the new plant on-line, reasonable potential no longer exists. To this end, the District proposes that this one/year monitoring only be required through the third year following the date of permit adoption. As such, a footnote is needed. Alternatively, additional monitoring for these banned compounds could be obtained as

Attachment A

part of the priority pollutant monitoring (i.e., quarterly during the third year of the permit term). These pesticides are among the 126 priority pollutants and would be covered by the priority pollutant monitoring requirement. Thus, the District requests that the separate monitoring requirement for these pesticides be modified in one of the manners identified above.

p. E-9, Table E-6, Reclamation Pond Monitoring Requirements. The last row of this table addresses pH. The sample type states “grab,” yet the frequency states “continuous.” The District requests that the “continuous” frequency be changed to “3/week.”

p. E-11, Municipal Water Supply. Because WWTP staff are expected to get data from other County/City Departments that monitor the quality of the municipal water supply used in the service area, rather than perform additional, redundant sampling, the District requests the modification to the text shown below.

B. Municipal Water Supply

1. Monitoring Location SPL-001

The Discharger shall monitor the Municipal Water Supply at SPL-001 ~~as follows.~~
A sampling station shall be established where a representative sample of the municipal water supply can be obtained. ~~Municipal water supply samples shall be collected at approximately the same time as effluent samples.~~

II. FACT SHEET

p. F-42, 4. Construction, Operation, and Maintenance Specifications. The last paragraph needs to have the following revisions on the permit section references:

Special Provisions, Section VI.C.5 should be changed to Section VI.C.4.d.

Monitoring and Reporting Requirements Attachment E, Section IX.B should be changed to Section X.C.1.

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